

REMARKS

Initially, in the Office Action dated April 22, 2004, the Examiner has rejected claim 1 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 5,953,541 (King et al.) Claims 2-9 have been rejected under 35 U.S.C. §103(a) as being unpatentable over King et al. in view of U.S. Patent No. 6,528,741 (Walker). Claim 9 has been objected to under 37 C.F.R. §1.75 as being a substantial duplicate of claim 4.

By the present response, Applicants have amended claims 1, 4, 5, and 7-9 to further clarify the invention. Claims 1 and 4-9 remain pending in the present application.

35 U.S.C. §102 Rejections

Claim 1 has been rejected under 35 U.S.C. §102(e) as being anticipated by King et al. Applicant respectfully traverses these rejections. Applicant discusses the Walker reference here since claim 1 has been amended with limitations that the Examiner has asserted Walker against in the §103 rejections.

King et al. discloses a reduced keyboard disambiguating system that includes a keyboard with twelve keys, nine of them labeled with numerous letters and other symbols, and those nine plus one more labeled each with one of the ten digits. Textual entry keystrokes are ambiguous. The user strikes a delimiting "Select" key at the end of each word, delimiting a keystroke sequence that could match any of many words with the same number of letters. The keystroke sequence is processed with a complete vocabulary, and words that match the sequence of keystrokes are

presented to the user in order of decreasing frequency of use. In addition, stems of longer words whose initial letters match the sequence of keystrokes are also presented to the user in order of decreasing frequency of use.

Walker discloses a portable electronic device that has a keypad for entering alphanumeric characters including a plurality of single contact keys and a multi-way shift key. A character is entered by actuating a single contact key alone or in combination with the multi-way shift key. The multi-way shift key may be a four-way rocker switch with each single contact key having five characters labels, four of which are arranged to indicate the direction in which the rocker switch should be actuated to enter the corresponding character.

Regarding claim 1, Applicant submits that King et al. does not disclose or suggest the limitations in the combination of this claim of, inter alia, entering characters into a text string using a non-ambiguous word editor of a wireless telephone that includes scrolling by a user through the characters included in a character group for appointing a desired character, where the user presses one alphanumeric key on the wireless telephone in order to provide a keystroke for selecting a character group, the user scrolling through the characters step-by-step using one of the alphanumeric keys in an alphanumeric keypad of the wireless telephone that becomes dedicated for scrolling when the wireless telephone is in an editor mode. In the §103 rejection of claim 2, the Examiner admits that King et al. does not disclose or suggest where the user presses one alphanumeric key on a wireless telephone in order to provide a keystroke for selecting a character group,

but asserts that Walker discloses this limitation at col. 1, lines 8-14 and 38-47. The cited portions of Walker merely disclose that due to an increasing requirement for entering characters such as alphanumeric text into portable electronic devices, which are becoming increasingly smaller, there is a need for a small size man-machine interface that is easy to operate and can handle typically 40 or more characters, and that the Walker invention includes a portable electronic device with a first key having N switch contacts where N is larger than two and each of the plurality of second keys having a single switch contact, where one of N characters may be selected by engaging in combination one of the N switch contacts of the first key and the single switch contact of one of the plurality of second keys. This is not a user pressing one alphanumeric key on a wireless telephone in order to provide a keystroke for selecting a character group, as recited in the claims of the present application. Walker discloses pressing two keys, a single contact key, and a multi-way shift key, simultaneously for alphanumeric characters. The disclosure of Walker describes a system for inputting data requiring a complex input means that requires two hands to be operable. This is not a user pressing one alphanumeric key in order to provide a keystroke for selecting a character group. Walker discloses actuating two keys in combination. An alphanumeric key according to the present invention also includes the commonly used keys for '*' and '#' that are normally found on 12 key ITU-T keypads.

The Examiner further asserts (in the §103 rejections of claims 3 and 8), that Walker teaches a first key used in conjunction with a second keys to scroll through

characters step-by-step in the Abstract, col. 1, lines 55-67 and Fig. 1. However, these portions of Walker merely disclose what has been mentioned previously, that the invention of Walker includes the use of first and second keys for selecting characters where one of the keys is a single contact key and the other is a multi-way shift key. These portions of Walker do not disclose or suggest a user scrolling through characters step-by-step using one of alphanumeric keys and an alphanumeric keypad of a wireless telephone. Moreover, neither King et al. nor Walker disclose or suggest the one alphanumeric key used by the user for scrolling through the characters becoming dedicated for scrolling when the wireless telephone is in an editor mode. These portions of Walker merely disclose using two keys to make a selection. These portions of Walker do not disclose or suggest anything related to scrolling, or an alphanumeric key in an alphanumeric keypad of a wireless telephone being used for scrolling when the wireless telephone is in an editor mode.

Accordingly, Applicant submits that neither King et al. nor Walker, taken alone or in any proper combination, disclose, suggest or render obvious the limitations in the combination of claim 1 of the present application. Applicant respectfully requests that this rejection be withdrawn and that this claim be allowed.

35 U.S.C. §103 Rejections

Claims 2-9 have been rejected under 35 U.S.C. §103(a) as being unpatentable over King et al. in view of Walker. Applicant has discussed the deficiencies of both King et al. and Walker in the remarks under the §102 rejections.

Applicant respectfully traverses these rejections and provides the following additional remarks.

Regarding claims 5 and 7, Applicant submits that none of the cited references, taken alone or in any proper combination, disclose, suggest or render obvious the limitations in the combination of each of these claims of, inter alia, a scroll key for appointing one of the characters in a respective groups of characters where the scroll key is one of the alphanumeric keys and becomes dedicated for scrolling when the terminal is in an editor mode, a predictive editor for providing word candidates in dependence of a sequence of alphanumeric keystrokes provided by the user by pressing one or more of the plurality of character entry alphanumeric keys, a non-ambiguous editor, for providing character candidates in dependence of a single of alphanumeric keystroke provided by the user by pressing one of the plurality of character entry alphanumeric keys, a scroll key common for both the editors for scrolling through candidates provided by the editors and appointing one of a character or a word, or where the scroll key is one of the alphanumeric keys and becomes dedicated for scrolling when the wireless telephone is in an editor mode. As noted previously, none of the cited references disclose or suggest a user pressing one alphanumeric key on a wireless telephone in order to provide a keystroke for selecting a character group, as recited in the claims of the present application. The Examiner admits that King et al. does not disclose or suggest where the user presses one alphanumeric key on a wireless telephone in order to provide a keystroke for selecting a character group. Further, Walker discloses

pressing two keys, a single contact key, and a multi-way shift key, simultaneously for alphanumeric characters

Moreover, the Examiner asserts that King et al. discloses a predictive editor in col. 11, lines 30-52 by the disclosure of a "keystroke sequence". However, a keystroke sequence as disclosed in King et al. does not disclose or suggest anything related to a predictive editor for providing word candidates in dependence of a sequence of alphanumeric keystrokes provided by a user, as recited in the claims of the present application. Keystroke sequences in King et al. merely relates to text entry. This does not disclose or suggest anything related to providing word candidates in dependence on a sequence of alphanumeric keystrokes.

In addition, the Examiner asserts that King et al. discloses a non-ambiguous editor at col. 9, lines 48-60. However, this portion of King et al. merely discloses the disambiguating system of King et al. that allows a user to enter text or other data using a single hand. This portion does not disclose or suggest a non-ambiguous editor, as recited in the claims of the present application. Further, this portion of King et al. does not disclose or suggest a non-ambiguous editor for providing character candidates in dependence of a single of alphanumeric keystroke provided by a user by pressing one of the plurality of character entry alphanumeric keys.

Further, Applicant submits that one of ordinary skill in the art would have no motivation to combine King et al. that relates to a reduced keyboard disambiguating system, with Walker, that relates to a text entry on a portable device. King et al. describes a system for inputting information using the commonly known T9

predictive word input engine. In contrast, Walker discloses a system for inputting data regarding a complex input means (multi-switch key and single contact key) therefore requiring two hands to be operable. The combination of King et al. and Walker would produce a device with text input using a predictive engine and having groups of characters assigned to each key and the text input when not using the predictive engine would use the complex multi-switch key to select which of the characters assigned to a specific key should be selected and this multi-switch key would be used differently in the two different modes (if used in both modes at all which would be the most obvious solution, to use one scroll key in predictive mode and the multi-switch key in the non-predictive input). This difference would be confusing and hard to learn for a user as there are already many functions attached to each key which many users find troublesome. Therefore, one of ordinary skill in the art would have no motivation to make this combination. Further, as has been noted previously, this combination fails to achieve the limitations in the claims of the present application.

Regarding claims 4, 8 and 9, Applicant submits that these claims are dependent on one of independent claims 1 and 5 and, therefore, are patentable at least for the same reasons noted regarding these independent claims. For example, Applicant submits that none of the cited references disclose or suggest where the user selects the appointed character by providing a new keystroke for selecting a character group including a following character.

Accordingly, Applicant submits that none of the cited references, taken alone or in any proper combination, disclose, suggest or render obvious the limitations in the combination of claims 4-9 of the present application. Applicant respectfully requests that these rejections be withdrawn and that these claims be allowed.

Double Patenting

Claim 9 has been objected to under 37 C.F.R. §1.75 as being a substantial duplicate of claim 4. Applicant submits that this is not a double patenting rejection in that neither claim 4 nor claim 9 have been allowed. In any event, claim 9 has been amended to further clarify the invention and Applicant respectfully requests that this rejection be withdrawn.

In view of the foregoing amendments and remarks, Applicant submits that claims 1 and 4-9 are now in condition for allowance. Accordingly, early allowance of such claims is respectfully requested.

U.S. Application No. 09/921,127

To the extent necessary, Applicants petition for an extension of time under 37 CFR 1.136. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, or credit any overpayment of fees, to the deposit account of Antonelli, Terry, Stout & Kraus, LLP, Deposit Account No. 01-2135 (referencing attorney docket no. 1030.40414X00).

Respectfully submitted,

ANTONELLI, TERRY, STOUT & KRAUS, LLP



Frederick D. Bailey
Registration No. 42,282

FDB/sdb
(703) 312-6600